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November 30, 1999

Ms. Wendy R. Dixon, EIS Project Manager
M/S 010
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 30307
North Las Vegas, NV 89036-0307

Dear Ms. Dixon:

**RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR A GEOLOGIC REPOSITORY
FOR THE DISPOSAL OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE
WASTE AT YUCCA MOUNTAIN, NYE COUNTY, NEVADA (DOE/EIS-0250-D)**

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Environmental Impact Statement (DEIS).

- 1 The Department's concern is the storage and loading of high level wastes, particularly surplus weapons-usable plutonium, from Los Alamos for disposal at the proposed Yucca Mountain site (Volume I, p.1-7; Volume II p.A-47). There is no information within the DEIS to indicate how Los Alamos will transfer such high-level radioactive material into the proper packaging (shipping casks). Specifically, the DEIS does not address what the potential contribution this activity at Los Alamos will be to radionuclide emissions subject to 40 CFR Part 61, Subpart H. Subpart H sets a facility-wide cap of ten millirems per year on the dose of radiation to which any member of the public might be exposed from air emissions. The DEIS should address to what extent a connected action of construction of facilities for waste packaging and loading at Los Alamos is necessary, and what the air quality impacts from packaging such wastes might be.

We appreciate the opportunity to review this document, please let us know if you have any questions on the above.

Sincerely,

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1306ER